

2

JAN P. JOHNSON
Standing Chapter 13 Trustee
Kristen A. Koo, State Bar #230856
P.O. Box 1708
Sacramento, California 95812-1708
(916) 492-8001
pobox1708@jpj13trustee.com

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF CALIFORNIA

SACRAMENTO DIVISION

IN RE:)	Case No: 13- 33550-A-13J
)	DC No.: JPJ-3
)	
LEWIS FRANK BROWN,)	TRUSTEE'S OBJECTION TO
)	DEBTOR'S CLAIM OF EXEMPTION
)	
)	DATE: JANUARY 13, 2014
)	TIME: 1:30 P.M.
<u>Debtor(s)</u>)	COURTROOM: 28

JAN P. JOHNSON, Chapter 13 Trustee, objects to the debtor's claim of exemption as:

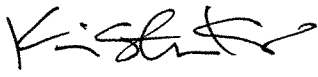
According to Schedule C filed with the voluntary petition on October 21, 2013, the debtor has claimed his interest in his residence located at 400 Lakeside Drive, Vallejo, California, an Infinity motor vehicle, a Mercedes commercial vehicle, residential building materials, jewelry, heirlooms and art, and Social Security Payments as exempt under "California Law ss 704". The debtor has failed to claim his property as exempt under a specific and complete exemption scheme. The debtor has made ambiguous claims for exemption.

///

///

1 WHEREFORE, the trustee prays that the Court enter an Order Sustaining the Trustee's
2 Objection to Claim of Exemption and that the claims of exemption on Schedule C filed on
3 October 21, 2013 be disallowed in their entirety.

4 Dated: December 10, 2013


5 /s/ Kristen A. Koo
6 Kristen A. Koo, Attorney for Chapter 13 Trustee
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21

22 13- 33550-A-13J

23 LEWIS FRANK BROWN
24